

Document Log Item

Addressing			
From		To	
Carmen Santos/R9/USEPA/US		miskarou@dtsc.ca.gov	
CC		BCC	
		armann.steve@epa.gov lieben.ivan@epa.gov alkon.margaret@epa.gov	
Description		Form Used: Memo	
Subject		Date/Time	
PCBs: Pechiney Site in Vernon		04/16/2010 12:21 PM	
# of Attachments	Total Bytes	NPM	Contributor
0	2,932		
Processing			
Comments			

Body

Document Body

Hello, Michel:

I have been assisting Linda Conlan (AMEC Geomatrix) regarding PCBs at the Pechiney site. I am drafting an approval for the AMEC's PCB risk-based disposal approval for the Pechiney site. I understand that DTSC is in the process of finalizing and issuing an Imminent and Substantial Endangerment Determination and Consent Order to Pechiney. A RAP required under that Order will be subject to a 30 day public comment period. I understand the PCB work that Pechiney is required to conduct under the federal Toxic Substances Control Act (TSCA) is incorporated into the Consent Order and the RAP. Is it possible for DTSC to share the draft Consent Order with EPA as an enforcement confidential document that cannot be released to the public given its deliberative nature? I just want to be aware of the language in the Order and /or the RAP that refers to the TSCA work.

Can you also clarify if the Consent Order is under a State authority analogous to federal Superfund or RCRA authority. That clarification would be very helpful.

Thank you for your courtesies. I look forward to your reply to this message and to talking with you.

Regards,
Carmen

Carmen D. Santos, Project Manager
RCRA Corrective Action Office
Waste Management Division
USEPA Region 9
415.972.3360
fax: 415.947.3533